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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

FILED

UNITED STATES OF AMERICA,

Plaintiff,

v.

Pedro Antonio PARRA-Montaniez

Defendant

Magistrate's Case No. 08-MJ-0548  
COMPLAINT FOR VIOLATION OF  
CLERK: U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

Title 21 U.S.C. 841(A)(1)

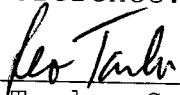
DEPUTY

Possession of a  
controlled substance  
with intent to  
Distribute


The undersigned complainant duly sworn states:

That on or about February 24, 2008, within the Southern District of California, defendant Pedro Antonio PARRA-Montaniez did knowingly and intentionally possess with intent to distribute approximately 348.18 kilograms (767.61 pounds) of marijuana, a Schedule I Controlled Substance, in violation of Title 21 United States Code, Section 841(a)(1).

And the complainant states that this complaint is based on the attached Statement of Facts, which is incorporated herein by reference.

  
Leo Tanlu, Special Agent  
Drug Enforcement Administration

Sworn to before me and subscribed in my presence, February 25, 2008.

  
UNITED STATES MAGISTRATE JUDGE

SIX

UNITED STATES OF AMERICA  
v.  
Pedro Antonio PARRA-Montaniez

STATEMENT OF FACTS

I, Special Agent Leo Tanlu, of the Drug Enforcement Administration, declare under penalty of perjury, the following is true and correct:

On February 24, 2008, at approximately 2:21 p.m., Border Patrol Agents Edward N. Ferreira and Michael J. Jackson were investigating a possible illegal vehicle entry into the United States from Mexico, east of the Tecate, California Port of Entry near Smith's Canyon in Campo, California. A sensor alerted B.P. Agents to a possible entry.

Senior Patrol Agent (SPA) Thomas C. Jackson and Border Patrol Agent (BPA) Raul R. Cardenas observed while driving south on Buckman Springs Road a white Jeep Cherokee traveling north on Buckman Springs Road. This area is close to Smith's Canyon. SPA T. Jackson stated the rear of the Jeep appeared to contain a heavy weight and the cargo area was covered with a blanket. Agents T. Jackson and Cardenas followed the vehicle northbound. The vehicle slowed down and stopped on the side of the road. Agents T. Jackson and Cardenas passed the vehicle and observed a Hispanic male

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with a mustache and full beard in the cab of the vehicle. The driver was wearing a blue jean jacket and a blue baseball cap. Agent Cardenas stated the driver appeared nervous. After agents passed the vehicle, the driver executed a U-turn and drove back southbound on Buckman Springs Road at a high rate of speed. Agents Cardenas and T. Jackson attempted to follow the vehicle but lost sight of it approximately one mile north of Highway 94.

At approximately 3:00 p.m. Agent Ferreira discovered tire tracks that originated in Mexico, crossed the U.S./Mexico International Border and traveled north on a dirt road known as Birdman's Access Road.

Agents M. Jackson and Ferreira drove north on Birdman's Access when they observed the southbound Jeep Cherokee attempt to pass them at a high rate of speed. The driver of the Jeep lost control of the vehicle and crashed into a large Manzanita bush. Agents M. Jackson and Ferreira ran towards the vehicle as the driver attempted to drive out of the bush. As they approached the vehicle, agents observed a large number of cellophane wrapped bundles in the rear passenger and cargo compartments. Footprints were discovered of a single person running south from the vehicle into the heavy brush.

Agents M. Jackson and Ferreira followed the footprints for

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approximately one hour and found an individual, later identified as Pedro Antonio PARRA-Montaniez, believed to be the driver walking along the railroad tracks. PARRA had taken off his boots in an apparent attempt to avoid being tracked. Subsequently, BPA Evan Brent tracked PARRA's foot sign from the Jeep to where he left his boots. BPA Jesus Malendez found PARRA's boots approximately one hundred yards from where PARRA was found. PARRA was arrested and transported to the Campo Border Patrol Station along with the Jeep Cherokee and the bundles of Marijuana for processing.

During processing the vehicle was found to contain 45 bundles of Marijuana with a total weight of 767.61 lbs. A field test by Border Patrol Agents of the bundle contents tested positive for the presence of Marijuana.

During ~~the~~ interview PARRA admitted to having knowledge of the marijuana.

Pedro Antonio PARRA-Montaniez was transported to the Metropolitan Correctional Center (MCC) pending an Initial Appearance before a United States Magistrate Judge.



Leo Tanlu, Special Agent  
Drug Enforcement Administration